

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

METROPOLITAN TRANSPORTATION AUTHORITY
and TRIBOROUGH BRIDGE AND TUNNEL
AUTHORITY,

Plaintiffs,

and

NEW YORK STATE DEPARTMENT OF
TRANSPORTATION, RIDERS ALLIANCE, SIERRA
CLUB, and NEW YORK CITY DEPARTMENT OF
TRANSPORTATION,

Intervenor-Plaintiffs,

v.

SEAN DUFFY, in his official capacity as Secretary of
the United States Department of Transportation,
GLORIA M. SHEPHERD, in her official capacity as
Executive Director of the Federal Highway
Administration, UNITED STATES DEPARTMENT
OF TRANSPORTATION, and FEDERAL HIGHWAY
ADMINISTRATION,

Defendants.

Case No. 25 Civ. 1413 (LJL)

**NOTICE OF MOTION FOR
LEAVE TO FILE
CONSOLIDATED SECOND
AMENDED COMPLAINT
BY THE METROPOLITAN
TRANSPORTATION
AUTHORITY,
TRIBOROUGH BRIDGE
AND TUNNEL
AUTHORITY, NEW YORK
STATE DEPARTMENT OF
TRANSPORTATION AND
NEW YORK CITY
DEPARTMENT OF
TRANSPORTATION**

PLEASE TAKE NOTICE that that upon the accompanying Memorandum of Law in Support of Plaintiffs the Metropolitan Transportation Authority, Triborough Bridge and Tunnel Authority, and Intervenor-Plaintiffs New York State Department of Transportation and New York City Department of Transportation's Motion for Leave to File a Consolidated Second Amended Complaint, and all other papers, pleadings, and proceedings herein, Plaintiffs the Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority and Intervenor-Plaintiffs New York State Department of Transportation and New York City Department of Transportation will move this Court, before the Honorable Lewis J. Liman, United States District Judge for the

Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an order granting leave to file a consolidated second amended complaint.

Defendants do not oppose this motion.

Dated: May 5, 2025
New York, New York

Respectfully submitted,

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